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December 23, 2024

VIA ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Freeman et al. v. Giuliani, No. 24-cv-6563 (LJL); No. 24-mc-353 (LJL)

Dear Judge Liman:

Plaintiffs Ruby Freeman and Wandrea' Moss respectfully submit this letter in response to the Court's December 20, 2024 Order, 24-cv-6563, ECF No. 150, 24-mc-353, ECF No. 184, directing the parties, including the intervenor, Mr. Andrew Giuliani, to submit letters by December 23, 2024 at 5:00 p.m. "listing their proposed witnesses, the topics of their testimony, and a request for an amount of time for their direct examination."

Plaintiffs submit the following:

No. 24-mc-353 (LJL)			
Witness	Will call / may call	Topic	Est. Time on Direct
Rudolph W. Giuliani	Will call	Plaintiffs expect Mr. Giuliani to testify to the ownership status and physical possession of the World Series Rings as well as to the circumstances around which he purportedly gifted the World Series Rings to his son.	30 minutes

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Plaintiffs further submit the following:

No. 24-cv-6563 (LJL) ¹			
Witness	Will call / may call	Topic	Est. Time on Direct
Rudolph W. Giuliani	Will call	Plaintiffs expect Mr. Giuliani to testify about his actions and intentions relating to establishing a homestead at the Palm Beach Condo within the meaning of the Florida Constitution.	3 hours

Respectfully submitted,

s/ Aaron E. Nathan

¹ Due to Mr. Giuliani's changing disclosures and other issues with non-compliance with discovery and discovery orders, Plaintiffs have not yet deposed any of the witnesses in connection with the homestead claim. Plaintiffs may seek to amend this disclosure should ongoing third-party discovery reveal relevant evidence necessitating additional trial witnesses.